

## **REMARKS**

This Response is submitted in complete response to the Office Action mailed August 8, 2000 (hereinafter, the "Office Action"). Per this Response, claims 1, 5, 7 and 13 have been amended and claims 19-21 have been added. Accordingly, claims 1 (as amended), 2-4, 5 (as amended), 6, 7 (as amended), 8-12, 13 (as amended), 14-18, and 19-21 (added) are pending in the application and are presented for re-consideration, which action is earnestly requested.

NO NEW MATTER HAS BEEN ADDED.

It is believed that no additional fees are due or owing in regard to the submission of this Response and its attached and related papers. However, if such fees are deemed due, the Office is invited to contact the undersigned at the address and telephone number listed below.

The paragraphs that follow in conjunction with the amendments to the application presented above are submitted in complete response to the points raised in the Office Action that require such action.

### **I. The Amendments and New claims presented herein:**

Presented above are Amendments to claims 1, 5, 7 and 13 and new claims 19-21. Such Amendments have been presented to better define the present invention and to place the same in condition for allowance. Such new claims have been added to further define the present invention and are in condition for allowance. NO NEW MATTER HAS BEEN ADDED. Allowance of all claims is earnestly requested, especially in view of the remarks presented below.

### **RE: Objections to the Drawings:**

At page 2 of the Office Action, the Examiner notes objections to the drawings and references a form PTO-948 attached to the Office Action. The Applicant respectfully requests to defer any and all formal corrections to the drawings until substantive examination of the claims is complete.

### **RE: Objections to the Specification:**

Spanning pages 2 and 3 of the Office Action, the Examiner objects to the disclosure and certain informalities therein. In particular, the Examiner objects to the use of the term URL in

applications, when referring to input/content streams and network connections. Accordingly, the specification and abstract have been amended to correct such informalities. For example, at page 5 of the specification, the sentence has been modified from “The present invention solves . . . includes and involves a scanner component that accesses an input content stream via a network connection (e.g., such as via a URL, etc.) to extract renderable content . . .” to “The present invention solves . . . includes and involves a scanner component that accesses an input content stream via a network connection (e.g., file, document or other content/data source located at a URL via the Internet and WWW, etc.) to extract renderable content . . .” The specification clearly describes the act of accessing a URL and downloading a file, document or other content/data source. Thus, the specification as amended clearly alleviates any informalities related to the usage of the term URL and its application to content streams and network connections. It is respectfully requested that the Examiner’s objection and requirements be treated as SATISFIED.

**I. Rejection of claim 5 under 35 U.S.C. § 112 ¶ 2:**

Spanning pages 3 and 4 of the Office Action, the Examiner rejects claim 5 under 35 U.S.C. § 112 ¶ 2 as being allegedly indefinite for failing to particularly point out and distinctly claim the subject matter with the Applicant regards as the invention. Specifically, the Examiner asserts that there is no antecedent basis for the term “said Internet site.”

The Applicant respectfully traverses the Examiner’s rejection and asserts the following remarks.

Claim 5 has been amended to depend upon claim 4, and therefore the term “said Internet site” has antecedent basis in claim 4. Accordingly, claim 5 meets the requirements of 35 U.S.C. § 112 ¶ 2, and it is respectfully requested that the Examiner’s rejection be withdrawn and that claim 5 be allowed to issue in a U.S. Patent.

**II. Rejection of claims 1-2, 4-8, 10-14, and 16-18 under 35 USC § 103(a):**

Spanning pages 4-6 of the Office Action, the Examiner rejects claims 1-2, 4-8, 10-14, and 16-18 under 35 USC § 103(a) as the invention defined thereby allegedly would have been obvious in view of a non-patent reference *Colby* (Colby, Martin. Special Edition Using SGML, Que, Macmillan Computer Publishing (1996. Chapter 7)). In particular, the Examiner asserts

that Colby suggests the modifications of browsers to include the ability to use replaceable DTDs retrieved while a browser operates. The Examiner further asserts that it would have been obvious to one having ordinary skill in the art at the time of the invention to modify a browser to use multiple DTDs, and therefore, to derive the present invention.

The Applicant respectfully traverses the Examiner's remarks and asserts the following remarks.

*Colby* suggests that the Internet and World Wide Web standard be changed from the HTML DTD to the entire superset of SGML. In order to accomplish his goal, *Colby* further suggests that SGML browsers be used or that current HTML browsers be modified to process SGML and related DTDs, with DTDs being processed separately for each document parsed. However, *Colby* fails to show, teach or otherwise suggest each and every elements of the present invention as defined by claims 1-2, 4-8, 10-14, and 16-18, as amended. For example, claim 1, as amended, defines a network client or browser that includes "a scanner component accessing an input content stream via a network connection to extract renderable content from said input content stream; a parsing component coupled to said scanner component for parsing said renderable content, **said renderable content containing both malformed and well-formed expressions**; and a replaceable document type definition component configured to control said parsing component based on a particular document type definition corresponding to a particular grammar **to transform said renderable content into well-formed objects to be processed by a content model based on said particular grammar**, said replaceable document type definition component being replaceable during execution of said network client." See claim 1, as amended, lines 1-9 (emphasis added). *Colby* fails to suggest that a DTD component be replaced during the execution of the browser that controls the parsing of content that may contain malformed expressions, to transform the malformed expressions into well-formed expression that may be rendered in a way that makes sense. For example, in a document to be rendered, a token may be realized outside of an HTML start tag, and typically, a browser would ignore and discard any expressions outside of a tag, or alternatively, malformed expressions may be rendered in a way that makes completely no sense. However, the present invention allows such tokens and constructs to be corrected (transformed into well-formed expressions) based on grammars defined by the replaceable DTD component(s). See specification, page 10, line 14, through page 11, line 2. Thus, it would not have been obvious to one having ordinary skill in the art at the

time of the invention to modify current browsers with the teachings of *Colby* to derive the present invention as defined by claim 1, as amended.

Independent claims 7 and 13, as amended, recite limitations consistent with claim 1 as amended, and the remarks made above regarding claim 1 apply to claims 7 and 13 with equal force. Similarly, the remarks made above regarding claim 1 apply with equal force to claims 2, 4-6, 8, 10-12, 14, and 16-18 because of their dependencies upon claims 1, 7, and 13, as amended. Therefore, it would not have been obvious to one having ordinary skill in the art at the time of the invention to modify current browsers with the teachings of *Colby* to derive the present invention as defined by claims 1-2, 4-8, 10-14, and 16-18, as amended.

Thus, for the foregoing reasons, it is respectfully asserted that the present invention, as defined by claims 1-2, 4-8, 10-14, and 16-18, as amended, is clearly distinguishable and therefore patentable over *Colby* under 35 USC § 103(a). Accordingly, it is earnestly requested that the Examiner's rejection be withdrawn and that claims 1-2, 4-8, 10-14, and 16-18, as amended, be allowed to issue in a U.S. Patent.

### **III. Rejection of claims 3, 9, and 15 under 35 USC § 103(a):**

At page 7 of the Office Action, the Examiner rejects claims 3, 9, and 15 under 35 USC § 103(a) as being unpatentable over *Colby* in view of *Powell* (Powell, Thomas A. "Extended the Web: An XML Primer." *Internetweek*, 11/24/97, Issue 691, pg. 47). In particular, the Examiner admits that *Colby* teaches nothing about rendering XML documents or using replaceable DTDs to render an XML document within a web browser. The Examiner attempts to make up for the admitted deficiencies of *Colby* by providing *Powell*. The Examiner asserts that *Powell* teaches that XML was designed to be a subset of SGML and is "useful for the Web." The Examiner further asserts that it would have been obvious to one having ordinary skill in the art at the time of the invention to use the teachings of *Powell* in view of *Colby* to modify a browser enabling a browser to use an XML DTD, and therefore, to derive the present invention as defined by claims 3, 9, and 15.

The Applicant respectfully traverses the Examiner's remarks and asserts the following remarks.

*Colby* suggests that the Internet and World Wide Web standard be changed from the HTML DTD to the entire superset of SGML. In order to accomplish his goal, *Colby* further

suggests that SGML browsers be used or that current HTML browsers be modified to process SGML and related DTDs, with DTDs being processed separately for each document parsed. However, *Colby* fails to show, teach or otherwise suggest each and every elements of the present invention as defined by claims 3, 9, and 15, as amended. For example, claim 3, as amended, defines a network client or browser that includes “a scanner component accessing an input content stream via a network connection to extract renderable content from said input content stream; a parsing component coupled to said scanner component for parsing said renderable content, **said renderable content containing both malformed and well-formed expressions;** and a replaceable document type definition component configured to control said parsing component based on a particular document type definition corresponding to a particular grammar **to transform said renderable content into well-formed objects to be processed by a content model based on said particular grammar,** said replaceable document type definition component being replaceable during execution of said network client” wherein “said replaceable document type definition component is configured to control said parsing component based said particular document type definition which corresponds to a definition for XML documents.” See claim 1, as amended, lines 1-9 and claim 3 lines 1-5 (emphasis added). As already described above, *Colby* fails to suggest that a DTD component be replaced during the execution of the browser that controls the parsing of content that may contain malformed expressions, to transform the malformed expressions into well-formed expression that may be rendered in a way that makes sense. The Examiner attempts to make up for the inadequacies of *Colby* by providing *Powell*. However, *Powell* merely teaches generally about XML and fails to show, teach or otherwise suggest that a DTD component be replaced during the execution of the browser that controls the parsing of content that may contain malformed expressions, to transform the malformed expressions into well-formed expression that may be rendered in a way that makes sense. In fact, *Powell* teaches that malformed XML document cannot be rendered at all. Thus, it would not have been obvious to one having ordinary skill in the art at the time of the invention to modify current browsers with the teachings of *Powell* in view of *Colby* to derive the present invention as defined by claim 3.

Claims 9 and 15 recite essentially the same limitations as claim 3 with respect to this rejection, and accordingly, the remarks made above with respect to claim 3 apply to claims 9 and 15 with equal force.

Thus, for the foregoing reasons, it is respectfully asserted that the present invention, as defined by claims 3, 9, and 15, is clearly distinguishable and therefore patentable over *Powell* in view of *Colby* under 35 USC § 103(a). Accordingly, it is earnestly requested that the Examiner's rejection be withdrawn and that claims 3, 9, and 15 be allowed to issue in a U.S. Patent.

#### **IV. Conclusions**

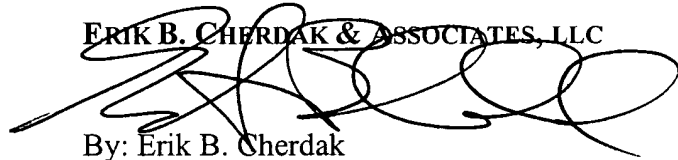
This Response is submitted in complete response to the Office Action mailed August 8, 2000 (hereinafter, the "Office Action"). Per this Response, claims 1, 5, 7 and 13 have been amended and claims 19-21 have been added. Accordingly, claims 1 (as amended), 2-4, 5 (as amended), 6, 7 (as amended), 8-12, 13 (as amended), 14-18, and 19-21 (added) are pending in the application and are presented for re-consideration, which action is earnestly requested.

NO NEW MATTER HAS BEEN ADDED.

It is believed that no additional fees are due or owing in regard to the submission of this Response and its attached and related papers. However, if such fees are deemed due, the Office is invited to contact the undersigned at the address and telephone number listed below.

Respectfully submitted,

**ERIK B. CHERDAK & ASSOCIATES, LLC**

A handwritten signature in black ink, appearing to read 'ERIK B. CHERDAK', written over the printed name.

By: Erik B. Cherdak

Reg. No. 39,936

Date: 12/6/2006

11300 Rockville Pike, Suite 906  
Rockville, Maryland 20852  
(301) 984-4700, FAX (301) 984-7696  
email: erik@ctpatents.com